

LAW OFFICES OF JIMMY M. SANTOS,PLLC

Civil Rights, Labor & Employment, & Civil Litigation

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July 16, 2021

VIA ECF

Hon Paul A. Engelmayer United States District Court Southern District of New York 40 Foley Square Room 2201A New York, NY 10007

Re:

<u>Tabitha Lulo v. OTG Management, Inc.</u> Civil Action No. 19-CV-03776 (PAE)

Dear Judge Engelmayer:

I represent the plaintiff in this action in which she caims that defendants subjected her to discrimination/ retaliation in violation of the FMLA, and discriminatory termination due to her pregnancy, and pregnancy-based disability in violation of the NYS and NYC Human Rights Laws.

Pursuant to Rule 1(E) of Your Honor's Individual Rules of Practice, and with the consent of defense counsel, I respectfully request that the Court extend the time to serve and file her opposition papers to this Monday, July 16, 2021. The current deadline is today. I apologize to the Court and to defense counsel for the short notice.

The reasons I'm asking for the extension are that yesterday, I had a hyperglycemic event connected to my diabetes which left me with half day to work. Today, I have had a mechanical printer/ scanner problem (pages are being eaten up by the feeder) which has yet to be rectified.

Defense counsel consents to this application, and this is the second request by either party to seek an extension of the original deadlines set forth with in your prior Order dated July 6, 2024 (Docket No. 46).

I appreciate Your Honor's consideration of plaintiff's application and I thank your Honor.

Respectfully Submitted,
_/S/__*Jimmy M. Santos*Jimmy M. Santos, Esq.

cc: Michael Schmidt, Esq. (via ECF)

Paul A. Engelnege

Granted. Plaintiff's time to file her opposition is extended until July 19, 2021.

SO ORDERED.

PAUL A. ENGELMAYER

July 19, 2021 United States District Judge